

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

④
JAN 31 2008

FILED

LOUIS C. SHEPTIN

PLAINTIFF

Case # 08-cv-116

JAN 31 2008 *sent*

MICHAEL W. ROBBINS
CLERK, U.S. DISTRICT COURT

vs.

HON. M. RONANLY, JUDGE

P. HARVEY, CLINICAL
DIRECTOR MCC ET AL,
DEFENDANT(S)

MOTION FOR THE APPOINTMENT OF COUNSEL

COMES NOW, PLAINTIFF LOUIS SHEPTIN AND
FOR GOOD CAUSE SHOWN, MOVES THE Honorable Court

TO APPOINT COUNSEL PRO BONO. PLAINTIFF WOULD

SHOW:

1) PLAINTIFF HAS PRODUCED FILES & RECORDS WHICH, UNDER
THE UNIFORM RULES OF EVIDENCE, RULE 803(6) CONSTITUTE
ACCEPTABLE EVIDENCE FOR COURT CONSIDERATION.

See U.S. v. Sanders, 749 F.2d 195; U.S. v. CROFT,
750 F.2d 1354; U.S. v. GRAVE 773 F.2d ~~1553~~

2) ADDITIONALLY THE COMPLEXITY OF THIS CASE

AND THE USE OF MEDICAL RECORDS BELONGING TO

SOMEONE ELSE; AND ADMINISTRATION OF SOMEONE

ELSE'S MEDICATIONS (PLURAL) TO PLAINTIFF ARE OF

SUCH DANGEROUS NATURE AS TO WARRANT APPOINTMENT.

3) ADDITIONALLY THE MORE FACT THAT DEFENDANT(S)

RELEASED JAMES T. CAIG'S MEDICAL RECORDS TO

PLAINTIFF CONSTITUTE A CLEAR VIOLATION OF THE

UNIFORM HEALTH CARE INFORMATION ACT SECTION

§ 2-101 (e)

4) BECAUSE DEFENDANT(S) WILFULLY AND INTENTIONALLY

WITH IMPUNITY FAIL TO DO FOLLOW-UP TREATMENT WITH

BOTH HOSPITAL'S ORDER, AND SYMPTOMS INDICATE NEED

FOR TREATMENT AND FOLLOW-UP (SEE CHESTER v. U.S.,

403 F.2d 458 (1975) AFF'D 546 F2d 413 (1976)

COUNSEL SHOULD BE APPOINTED, AS PLAINTIFF'S HEALTH WORSENS.

BECAUSE PLAINTIFF, PRO SE, PRESENTS A CASE
WITH SUFFICIENT EVIDENCE, WITNESSES, AND IS
IN AN EMINENT DANGER OF SERIOUS BODILY INJURY OR
DEATH, CIRCUMSTANCES SHOULD REQUIRE THE HONORABLE
COURT TO THINK IN THE DIRECTION OF APPOINTMENT
OF COUNSEL.

WHEREFORE, PREMISIS CONSIDERED, THE PLAINTIFF
RESPECTFULLY MOVES FOR APPOINTMENT OF COUNSEL
EITHER PRO BONO OR CONTINGENCY. AS PLAINTIFF'S
HEALTH (CONDITIONS) WORSENS, IT BECOMES MORE
DIFFICULT TO PREPARE CITATIONS IN THIS CASE.

RESPECTFULLY SUBMITTED,

Yol. M. W.

1/28/08

Howard C. SIEGMUND

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